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January 7, 2000

David Waddell
Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Application of CapRock Telecommunications Corp. for a Certificate of Convenience and Necessity as a Competing Telecommunications Service Provider
Docket No. 99-00852

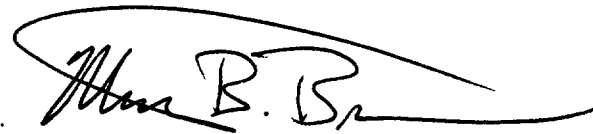
Dear Mr. Waddell:

Enclosed please find an original and 13 copies of CapRock's IntraLATA Toll Dialing Parity Plan and a summary of its complaint history, per the request of the TRA. If you have any questions concerning this matter, please give me a call.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:



Michael B. Bressman

cc: C. Mundy

Enclosures

FILE

CapRock Telecommunications Corp.

99-00852

IntraLATA Toll Dialing Parity Plan

FILE

**CapRock Telecommunications Corp.
IntraLATA Toll Dialing Parity Plan**

I. OBJECTIVE/PURPOSE

In compliance with regulatory requirements in Tennessee, **CapRock Telecommunications Corp. (“CapRock” or the “Company”)** files the Company’s plan for implementing intraLATA toll dialing parity (“the Plan”) in the areas of the State in which the company is certified to provide local exchange service. Specifically, **CapRock** will make toll dialing parity available in all exchanges and LATAs in which it operates within the State.

The intent of the Plan is to permit customers to route intraLATA toll calls automatically, without the use of access codes, to any interexchange carrier (“IXC”) of the customer’s choice.

II. IMPLEMENTATION SCHEDULE

CapRock will offer dialing parity for intraLATA toll calls once it commences service in Tennessee. At that time, **CapRock’s** retail customers may choose any IXC that has established itself as an access customer under **CapRock’s** Access Tariff.

III. CARRIER SELECTION PROCEDURES

CapRock will implement the full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to presubscribe to one telecommunications carrier for interLATA toll calls and to presubscribe to the same or a different participating telecommunications carrier for intraLATA toll calls. Processes will be in place to provide

new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

Processes have been established to provide new customers with an opportunity to choose their intraLATA toll carrier. Company employees who communicate with the public, accept orders and serve in customer service capacities are being trained to explain to customers the availability of 2-PIC equal access, and to assist customers in making an initial PIC choice or in changing a PIC choice for intraLATA and interLATA toll calls.

IV. **CARRIER NOTIFICATION**

Interexchange carriers that desire to become access customers shall notify **CapRock** via letter or telephone call of their desire to obtain exchange access service information. **CapRock** will send each requesting carrier an information package describing **CapRock's** service, processes and applicable tariffs. Once **CapRock** receives and processes an IXC's Access Service Request, that carrier will be added to the list of participating carriers made available to a requesting customer trying to choose a PIC. **CapRock** will provide notice of those switches available for exchange access service to IXCs by identifying those switches in **CapRock's** tariffs. In addition, **CapRock** will include a list of available switches in its information package provided to each IXC in response to an inquiry.

V. **NEW CUSTOMERS**

Customers who contact **CapRock** requesting new telephone exchange service will be informed of the opportunity to choose both an intraLATA and interLATA PIC. If requested by the customer, **CapRock** will provide a list of telecommunication carriers that are access customers and are maintaining a relationship with **CapRock** pursuant to the provisions of the Company's Access Services Tariff. The list of intraLATA toll carriers will

be presented in a competitively neutral manner. New customers who do not make a positive choice for an intraLATA toll carrier will be identified within **CapRock**'s system as "no-PIC" and will not be automatically defaulted to a carrier. New customers identified as "no-PIC" within **CapRock**'s system will be required to dial the access code of a different carrier to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

VI. EXISTING CUSTOMERS

On the date in which intraLATA toll presubscription is available, **CapRock**'s customers will be notified that they may presubscribe to **CapRock** or any participating telecommunications carrier offering interexchange service. An existing customer who does not make a choice will remain with its existing intraLATA carrier until the customer affirmatively chooses a different intraLATA toll carrier.

VII. INITIAL PIC REQUEST

A customer's initial PIC request, made prior to or within six (6) months after implementation of intraLATA equal access, will be made at no charge. After the initial six month period, **CapRock** will bill a customer a PIC change charge at a rate no greater than the rate for the selection of an interLATA PIC.

VIII. APPLICABLE RULES

As indicated in its Application for a Certificate of Convenience and Necessity as a Telecommunications Service Provider, **CapRock** will comply with all applicable rules of the Tennessee Regulatory Authority.

Summary of Complaint History

CapRock Telecommunications Corp. has an exemplary record with respect to regulatory complaints. The Federal Communications Commission ("FCC") and State Public Utilities Commissions (or their equivalents) have not ruled against CapRock Telecommunications Corp. and its operating affiliates on any matter related to customer service. To date, only 11 inquiries have been initiated by the Texas Public Utilities Commission and one was initiated by the FCC. The FCC matter was dismissed with no findings against CapRock. The majority of the Texas matters have been dismissed with no findings against CapRock. A few matters remain administratively open and CapRock anticipates dismissal of each of those matters in the near future.